

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF KENTUCKY,)
INC. FOR A LIMITED DEVIATION FROM THE) CASE NO.
REQUIREMENTS OF 807 KAR 5:022, SECTION) 2015-00084
14(22)(a))

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. ("Columbia Gas"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due 14 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Columbia Gas shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Columbia Gas fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a document containing personal information, Columbia Gas shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Columbia's application, the last sentence of paragraph 3, which states, "After reviewing this rule in depth, Columbia interprets the Commission rule to require a recording pressure gauge downstream of *every distinct pressure system*." (Emphasis in original). Describe what is meant by "distinct pressure system" as used in this sentence.

2. Refer to Columbia's application, the last sentence of paragraph 4, which states, "Columbia meets the federal standard, and has recording pressure gauges for each distribution system having two or more district stations."

a. Based on the wording in this sentence, how many "distribution systems" does Columbia have?

b. Describe each "distribution system" by location and identify the number of district pressure-regulating stations supplying each location.

3. Refer to Columbia's application, the first sentence of paragraph 5, which states that "Columbia's infrastructure includes 312 distinct pressure systems controlled by approximately 550 district regulator stations."

a. Does Columbia consider each of these 312 distinct pressure systems to be separate distribution systems?

b. Describe what is meant by the word "controlled" in this sentence.

4. Refer to Columbia's application, the second sentence in paragraph 5, which states that "[t]o comply with the Commission's rule, Columbia would be required to add 166 additional recording pressure gauges to district regulator stations." How many recording pressure gauges does Columbia currently have on its entire system?

5. Identify each location for which a deviation from 807 KAR 5:022, Section 14(22)(a), is sought.

6. Identify the number of customers, length of distribution line, and size of distribution line served by each location for which a deviation is sought.

7. What is the operating pressure for each location for which a deviation is sought?

8. How does Columbia currently monitor and record pressures of each of the locations for which a deviation is sought?

9. If the Commission were to grant the requested deviations for the locations identified in Item 5 above, will each of these locations comply with 49 C.F.R. Part 192.741? Describe.

10. Is Columbia aware of the Commission having granted a deviation from the requirements of 807 KAR 5:022, Section 14(22)(a), to any utility other than Atmos Energy in Case No. 2004-00275?¹


Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **JUN 12 2015**

cc: Parties of Record

¹ Case No. 2004-00275, *Application of Atmos Energy Corporation for a Limited Deviation from the Requirements of 807 KAR 5:022, Section 4(23)(B)(1-4), and 807 KAR 5:022, Section 14(22)(a)* (Ky. PSC Jan. 20, 2005).

*Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

*Honorable Stephen B Seiple
Attorney at Law
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OHIO 43216-0117